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JONATHAN PELTZ and KATHLEEN GALLAGHER

[Counsel cont. on next page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

JONATHAN PELTZ and KATHLEEN
GALLAGHER,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipal
entity, CHIEF MICHEL MOORE, a public
entity, and DOES 1 through 10 inclusive,

Defendants.

Case No.: 2:22-cv-03106-HDV-AGR

[Assigned to the Honorable Hernán D.
Vera - Courtroom 5B]

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST TO
VACATE ALL DATES**

Complaint Filed: May 9, 2022
Trial: August 5, 2025

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TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Jonathan Peltz and Kathleen Gallagher, (“Plaintiffs”) and the City of Los Angeles (“Defendant”) (collectively “the Parties”) have reached a conditional settlement of this entire action.

1. The Parties hereby report to the Court that a settlement has been reached as to all claims pursuant to a Mediator’s Proposal.

2. The Settlement is conditioned upon approval of the City of Los Angeles’ Claims Board, the Budget & Finance Committee, City Council, and the Mayor. The settlement approval process is expected to take approximately four months.

3. If the settlement is approved, then the Parties will file a stipulation to dismiss the entire action within seven (7) days of Plaintiffs’ receipt of the settlement funds.

4. Accordingly, the Parties respectfully request that this Court vacate all pending dates, including the trial date of August 5, 2025 and stay all proceedings pending the approval of the settlement. The Parties further agree and request that if the settlement is not approved, then this Court shall reset the dates, so that the case can proceed to trial.

Dated: August 4, 2025

Respectfully Submitted,

HADSELL STORMER RENICK & DAI LLP

By: /s/ - Kate McFarlane¹

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¹ I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

1 Dated: August 5, 2025

Respectfully submitted

2 BURKE, WILLIAMS & SORENSEN, LLP

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4 By: /s/ - Brian S. Ginter

5 Charles E. Slyngstad

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